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ABSTRACT

Ways in which the shape of New Zealand's educational system crucially affected the implementation process of market oriented educational reforms are examined in this paper. The first part discusses educational reform in New Zealand as political management. The Labour government's program from 1987 to 1990 was designed to reduce the size and scope of the state through privatization. Although the educational restructuring established structures to implement neoliberal reforms, the ideologies of the market were largely absent. The second part examines international influences behind the move to market education. Reforms under the National Party's 1991 budget are discussed in the third part, which argues that the market system will continue to be contested, due to centralization and educators' belief in equity. A conclusion is that united opposition to reforms is a function of the shape and structure of the education system and New Zealand's history, which are characterized by centralization, belief in equity, and homogeneity among the schools. Although centralization and vulnerability to international trends have facilitated direct reforms, the centralized structure has simultaneously engendered opposition that is absent from other national contexts. (33 references) (LMI)

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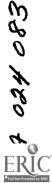
Liz Gordon

The starting point of this paper is the remarkable success of a relatively coherent, and strongly trans-national, set of ideologies in securing a process of market oriented educational reforms in a number of nations; not the least in Britain, the United States and New Zealand. In order to explain this success, it is necessary to understand the relationship of this set of ideologies to two factors. Firstly, market educational reforms are the corollary of the more general shift from Keynesian to neoliberal forms of national economic management, with implications not just for education but for the state as a whole. Secondly, the shift to neo-liberal forms of economic management was itself predicated on the failure of Keynesian policies to solve the economic and political crises of many nations which began in the late 1960s and early 1970s.

Thus the basis on which market educational reforms can be understood as trans-national, if not global, is as part of a solution to a common set of economic circumstances, including the falling rate of profit, the growth in multi-national corporations, increasing national debt, rising unemployment, high levels of inflation and spiralling welfare costs, to name just a few.

However, the relationship between economic problems and political 'solutions' is far from direct and clear. In claiming a common economic basis, rooted in a global crisis of capitalism, for the ideologies of neo-liberalism, I would not wish to argue that political responses have been the same in every country. Whilst similar themes can be identified in the literature, major differences are also evident. These differences can be explained by those elements of states that are nationspecific. Examples of such factors include the previous political settlements (CCCS, 1981), broad historical forces, the institutional arrangements of state agencies and governments and the nature of social expectations within civil society.

It is the particular mixture of national specificities and trans-national trends that allows for national comparisons to be made about the implementation of market reforms in education (as well as in many other aspects of the state). A central issue is what kind of education system pre-existed the move to market reforms. Bruce Cooper (1990) notes a number of differences between the education systems of Britain and the United States, a key issue being the level of decentralization of control over education preceding the reform processes (p. 133). He notes that the high level of decentralization of education in the United States has impeded the implementation of market reforms.



contrast, the relatively centralized British system allowed for a much more direct implementation of new policies.

New Zealand's education system has been for many years one of the most centralized in the world. Whilst Britain's system relied heavily on the intermediary role of the Local Education Authorities, New Zealand had only a minimal regional level of organisation, focussed only on primary schools and playing a servicing rather than a policy role. The particular shape of New Zealand's education system, I will argue below, crucially affected the process of the implementation of market reforms in that country. Although, as Cooper notes, high levels of centralization make it much easier for a government to implement reforms, such centralisation also provides a much sharper focus for contestation, as has been shown in New Zealand (see Gordon 1992 a, b and c).

Another feature of New Zealand's schooling system that differs from those of both Britain and the United States is the relative homogeneity between schools, in two respects. Firstly, as in the United States, New Zealand has a single type of state secondary school which, in British terms, may be considered the same as 'comprehensive' schools. Thus, there are no formalised inequalities of outcome between schools. As well, compared to both Britain and the United States, informal differences between schools, based on class or race specific factors have been relatively small; although increasing. This, I will argue, has crucial implications for the development of a market education system in New Zealand.

Although both these factors had an enormous effect on the implementation of market educational reforms in New Zealand, a more immediate influence on the reform process was the political context in which it took place, and in particular the set of ideologies that drove this process.

Educational reform as political management

In both Britain and the United States, programmes for educational reform emerged out of, and were articulated within, conservative political discourses. In New Zealand, however, the move to monetarism in the economic sector, and eventually a market education system, was begun by a Labour Government in 1984. The election campaign was waged by Labour on a traditional Keynesian welfare state platform of social justice, increased government intervention and industrial democracy. However, within days of becoming the Government, the first steps were taken towards a free market economy. From being one of the most controlled and protected economies in the world, New Zealand became, within the space of



three years, one of the least regulated, and an international leader in the push for a world-wide free market. During this three year term, however, Labour left relatively untouched the mechanisms of the state. In 1987, re-elected on a contradictory platform of free market and welfare state, Labour turned its attention to state agencies.

The Government's programme between 1987-1990 was, in retrospect, designed to reduce the size and scope of the state, in line with a central neo-liberal imperative that:

The privatised provision of all services produces efficiency and choice for the individual consumer.... extensions of market relations and privatisation are extensions of freedom (Ball 1990 p. 39).

One aspect of this reduction in the size of the state involved the sale of state agencies, including the national airline, post office banking services, national forests and the government printing organisation (amongst many others). Two aspects of neo-liberal philosophy underpinned the political arguments for the sale of these state assets. One was the ingrained belief that the private sector was more efficient than the public sector, and more suited to running any kind of business. The second was that profits from the sale of state agencies could be used to repay part of the large public debt. In a curious and fundamental switch in New Zealand's economic philosophy, public debt became viewed as a national burden, whereas private debt was perceived as the basis for reviving the nation's economic fortunes (see Fisher, 1991 p. 45 for an international perspective on this).

However, many state agencies, particularly those associated with the welfare state, could not be privatised. A further process of reform was introduced for these agencies, which was based on the following principles, which stem largely from 'public choice' theory (Buchanan, 1975):

- In every instance, there should be a separation of policy from operations, and of funding from provision, in order to minimise the effects of self-interest at every level of the system and thus to maximise efficiency;
- Where possible, elements of services would be privatised.
 Where this was not possible, the real costs of each element
 would be calculated. Costs would be 'transparent'. A policy of
 user pays would ensure that in many operations costs would be
 recovered;



- As far as possible, state agencies would be re-organised to ensure clear lines of accountability. There were two mechanisms for achieving this goal. First, the re-organisation of management relations, with large numbers of new managers being appointed on short-term, performance-related contracts, led to new forms of control within organisations. Second, a system of contractual relations, where one party would contract to undertake certain tasks for another party, ensured control between agencies of the state, in particular between central and local levels;
- In all cases, new processes of accountability were to be developed to ensure that agencies were performing as expected.

A number of other elements backed up these management changes, including new legislation governing state sector employment. For the first time, senior executive appointments within the state were to be subject to political scrutiny, and possibly to political control (Walsh, 1990), and these appointments would in future be on a contract basis rather than for life (see Boston et al., 1991 for a complete analysis).

These bureaucratic principles were built heavily on neo-liberal assumptions; what one British advocate of this kind of reform called "the economics of politics" (Sexton, 1991). Their purpose was to bring state agencies into line with what was perceived as the ideal of the private business. The stress on the separation of funding from provision, a managerial hierarchical organisational form, and quite authoritarian forms of accountability, was intended to make state agencies increasingly 'efficient', according to a particularly narrow definition of efficiency. The 'user pays' aspects of the state reforms were based on the belief that people value only what they have to pay for. Restructuring of the state in New Zealand demonstrably proceeded in a direction dictated to by a naive interpretation of neo-liberal economic theories into the organisational domain (see Boston, 1991 for an analysis of the basis of state sector reforms as a whole, and Gordon 1992a and 1992b for their application to education).

Between 1987 and 1990, then, the administrative base of the whole state sector was restructured. This involved large staff losses in some areas, a reduction in services (the most contested being the closure of many small post offices), and other services becoming chargeable for the first time. These changes were politically justified on the grounds that that would lead to cheaper, more efficient and more effective services (even though some people would now have to travel 100 kilometres to collect their pensions!). In fact, Chris Rudd's analysis (1991) shows clearly that there were no overall savings (despite the sale of many state assets) between 1984 and 1990 and, in the welfare area, expenditure



increased markedly, due partially to the increase in unemployment caused by monetarist economic policies.

The restructuring of education began in 1987, with the appointment of a Committee to suggest changes to the administrative base of the education system. Unlike Britain and the United States, there had been little preceding agitation to the demands for change in education. The state schooling system was (and is) one of the cheapest in the world. It was, compared to other countries, relatively egalitarian within and between sectors, including open entry to nearly all University courses for anyone who had passed senior school exams or attained the age of 20 years. In the crucial areas of literacy and science, New Zealand schools consistently rated at or near the top in international surveys, although performance in Maths was only average (Elley, 1991). Unlike other countries (Mac an Ghaill, 1991), New Zealand teachers had not been subject to any sustained attack from parents, politicians, media or employers.

There were, however, some existing and emerging criticisms of the state schooling system. Some came from within the broadly Keynesian educational settlement, relating to the unresponsiveness of the centralised bureaucracy, the inability of the system to respond to Maori demands for a more effective education process and the apparent lack of effective communication between central structures and local demands. However it was the Treasury, a central state organisation that many claimed had driven the move to monetarism in New Zealand (Easton, 1989), and whose ideas had demonstrably been imported from the United States and Britain, who developed the most damning critique of state education, from within a neo-liberal framework (Treasury, 1987). In a startling departure from previous practice, Treasury produced their 294 page volume on education as part of its 1987 briefing papers to the incoming government. Treasury treated education as a 'commodity' (Grace, 1990) rather than as a public good, and argued on that basis that there was perhaps little justification for state funding, and even less for state provision, of education. Moreover, it was argued, the state schooling system was replete with self-serving bureaucrats and teachers, who had captured the benefits of education for themselves, rather than for their students (see Boston et al, 1988, Lauder et al, 1988 for a full discussion on the Treasury document).

In another new departure, the Committee to investigate the administration of education was chaired not by an educationalist, but by a supermarket magnate, Brian Picot. This was the first indication of a trend that was to see educational reforms increasingly driven by non-educationalists. This committee recommended a radical restructuring of the system of education. The central Department of Education



would be abolished, and replaced with a smaller Ministry having responsibility for education policy. All the regional structures of education would be abolished. Those services previously undertaken by the central and regional state agencies would now be the responsibility of individual schools. All the operational funding would be dispersed to individual schools, who would eventually also manage the funding for teacher salaries (thus there were two components to school funding - operations and salaries).

However, these funds were not to be controlled and spent by school staff. Each school would have a Board of Trustees, made up primarily of parents of children attending the school, and elected by the parents. School principals, a representative of the staff and a representative of students would also sit on this committee. The Board would be responsible for school policy and funding.

However, Boards were not free to act as they wished. In line with the contractualist goals of the state, a school charter was to be drawn up between the state and the individual school, which would ensure that each school met both national imperatives and local goals (see Codd and Gordon, 1991).

I have argued elsewhere that the proposals of the Picot Committee represent an uneasy compromise between neo-liberal imperatives and traditional Labour concerns with equity and 'community' (Gordon, 1992a). Wilson (1991) demonstrates that the contradictions between these two discourses are, in fact, enshrined in the Picot Report itself. The Labour Government, in almost fully endorsing the findings and proposals of the Picot Committee, ensured that the contradictions of the report would have to be played out within the educational arena through the processes of policy implementation.

Perhaps the best way to describe the Picot Report is that it set up a new structure of education which was faithful to the tenets of neo-liberal management theories outlined earlier, but that largely missing from the report was the emphasis on competition and the market; the essential ideological discourses which would transform education into the image of a private business. 'Choice', for example, was one of the themes outlined in the Report (Picot, 1988, 1.2.2), but it was choice tempered by the demands for equity within and between schools and learners.

Because the Report, and the subsequent government policy document Tomorrow's Schools (Lange, 1988) enshrined major contradictions between the demands for competition and equity, it was left to those implementing the policy to solve these contradictions. Unlike the policy making process, which had been largely controlled by those



outside the educational field, the implementation process was in the hands of educators, including large numbers of staff from the Department of Education, which was soon to be defunct. Although the structure of education was fixed, the processes were still to be worked out. Starting from a view that equity ideals must be upheld, many of the implementation committees were able to subvert the market-oriented intent of the policy makers.

The best example of this process related to the school charter. It was viewed in the Picot Report as a document that would "define the purposes of the institution and the intended outcomes for students... within the national objectives for education" (Picot, 1988, 5.2.2). It was described as a partnership between the state and the individual school. In the draft charter document released by the implementation committee in May 1989, more than 80 percent of the charter content was determined nationally; much of it relating to equity issues to do with Maori people, women, and other 'disadvantaged' groups. Essentially, this document removed the possibility of competition within and between schools. One clause of the charter, for example, stated that:

The board of trustees accepts that equity objectives underpin all activities in this school (and) ... will ensure that the school's policies and practices seek to achieve equitable outcomes for students of both sexes, for rural and urban students; for all students irrespective of their religious, ethnic, cultural, social, family and class backgrounds, and irrespective of their ability or disability (Charter framework, January 1990 p. 5).

Educational groups were thus, through the implementation process, able to reclaim ground from the neo-liberals. This process was assisted by Labour's own contradictory stance on educational issues, although was bitterly contested by Treasury and its new, powerful ally within the state: the State Services Commission.

The new structure of educational administration was put fully into operation in October 1989, with the exception of one essential element: although the bulk funding for schools' operations was devolved as promised, teacher salary funding remained centralized, as a result of a very successful campaign organised by the teacher unions. They argued that the devolution of teacher salary funding to schools would constitute a first step in the breakdown of national salary agreements, and would put pressure on schools to cut salaries or increase class sizes.

In 1990, a powerful group of leading businessmen (there are no women members), the New Zealand Business Roundtable, who had already sponsored the visit of the pro-voucher neo-liberal E.G. West, brought



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out to New Zealand one Stuart Sexton, a British lobbyist well known in his home country for his extreme neo-liberal views on education. He was, and is, one of the leading advocates of a market system of vouchers. Sexton stayed in New Zealand only two weeks, but in that time he claimed to have thoroughly researched the New Zealand education system and proposed a series of changes to the reform process. However, in the context of a Labour Government well behind in the polls, with a general election due in October, and with signs of a retreat by that government from its state reforms in a number of areas, the Business Roundtable delayed the release of the Sexton Report (see Jesson 1991a and b on the strategies employed by the Business Roundtable).

In the event, the Roundtable and the opinion polls were quite correct, and in October 1990 the National Party, traditionally a party of social and political conservatism, were swept into office with a record majority.

International influences: the move to market education in New Zealand

The shape of educational reforms under the Labour Government was determined by two major factors: the equivocation of the government itself, over the opposing agendas of market competition and social equity, and increasing contestation between state agencies over the goals of educational reform. The uncertainty and ongoing struggle allowed educational interests to maintain many of the egalitarian functions of the educational system, albeit within a new structure of education which was clearly amenable to a neo-liberal 'market' model.

By the time of the general election, the gains made by educators in the implementation process of the new system had begun to be challenged by other state agencies. In its briefing papers to the incoming Minister, the State Services Commission paid specific attention to education, and in particular to the reform process. In an appendix to its education report, this agency noted of the reform process:

The large number of such (educational) groups and the intensive nature of their work meant central agency officials had only limited influence on the process. Chairpersons appear to have been appointed primarily on the basis of the respect they commanded in the education field, rather than their independence or objectivity. It was obvious from some of the policy papers that were rejected, that some working group members were opposed to the reforms.... The State Services Commission considers that this was an inefficient implementation process that provided a wealth of opportunities



for relitigation of policy and the watering down of various policy intents.... This process by which interested organisations developed proposals which were then commented on by officials is the direct reversal of the way in which policy is usually developed (1990 p. 2).

Not content with attacking the reform process, however, the Commission set about affirming that even the new Ministry of Education could not necessarily be trusted to develop education policy, in a trend that was to become increasingly evident during 1991:

However, it seems that the new Ministry regularly uses this approach in its policy development which suggests it may have difficulty in providing neutral advice of a high quality (1990 p. 2).

In February the Business Roundtable released the Sexton Report. This report urged that the government should go much further in the area of educational reform, and implement a full market system. Sexton blamed teachers and other educationalists for subverting the reform process, and attacked teachers for being 'complacent' about education. I do not intend to go into the details of Sexton's analysis, except to say that it emphasised, of course, choice, competition and the market, school based training and lower wages for teachers, and an eventual move to a complete voucher system. The Report also recommended a further reduction in the role of the central Ministry of Education, removing its policy advice role (policy would be driven by individual schools) and relegating the Ministry to a mechanism for dispersing central funding. The report showed a total lack of understanding of Maori issues, and argued against strategies for equalising educational opportunity for women. Of the stress on equity in the charter, he notes:

This is a disastrous recipe for mediocrity....Give the dull, lazy child every opportunity and the child may still achieve little, but little is better than nothing. Give the bright, diligent, enthusiastic child every opportunity and the sky is the limit. The tallest of poppies will result (Sexton, 1991 p. 58).

At approximately the same time as the Sexton Report was released, a group of Harvard economists led by Michael Porter released a report on New Zealand. This report argued that New Zealand's education system was inadequate to meet the needs of the economy for international competition in world markets (Crocombe et al, 1991), and was framed within the neo-liberal model with which New Zealand had become familiar. It argued that schools should foster competition between pupils, at the same time as putting emphasis on science and technology. The Porter project had, as Peters (1992) notes, worked



within a strict neo-liberal framework, and the final report either omitted, rejected or moulded to fit contributions which disagreed with this model. Peters notes that no research was actually undertaken on education for this project, with the result that some of its claims are false or equivocal (Peters, 1991). However, Porter's recommendations were enthusiastically taken up by the Minister, who claimed that the Labour Government's 'social agenda' had stifled competition to the detriment of learning "...Labour's social engineering at the expense of our children's future must be stopped" (Smith, 1991a p. 4). The Minister also appeared to accept Sexton's analysis of the equity ideals still enshrined in the schooling system, and he ennounced in early 1991 that those elements of the school charter relating to Maori issues would no longer be compulsory.

The 1991 budget

I argued earlier that the educational reforms under the Labour Government had set up the structures to allow for a neo-liberal reformation of education, but that the ideologies of the market were largely missing. Jessop et al (1990) argue in the British context that structural change must be accompanied by widespread adoption of appropriate ideologies within civil society, where those changes involve a reduction in state control, otherwise policies cannot work. The National Government, lacking Labour's commitment to social equity, began a process of structural re-organisation allied to attempts to change the dominant social democratic ideologies of education in its first budget as the new government, in August 1991. An overtly ideological document, the Minister's budget report on education (Smith, 1991b) was entitled: "Investing in people - our greatest asset". The report identifies 'the problem' as being "New Zealanders are not receiving the education they need" (p. 12). The education they are receiving has an "excessive focus on social issues and poor preparation for the competitive world" (p. 1) and the system "has so far failed to produce sufficient people with the advanced levels of skills and knowledge demanded by the highly competitive, high-technology market place in which New Zealand must prosper" (p. 3). The aim of the new reforms is to develop an education system which is:

...responsive to the changing marketplace and to community needs; efficient in its use of resources; able to produce the generic and specific skills required by the workforce of the future; tuned to the economic restraint within which all government activities must operate; realistic in its demands on taxpayers (1991 p. 6).

The budget cut further funds from a number of central educational agencies, including the Ministry of Education and eight others. It



discontinued funding support for twenty two other agencies, from the National Youth Choir to the Women's Advisory Committee on Education. Sexton had advocated the abolition of teacher registration, but instead, and with a similar effect, registration was made voluntary. The effect of this is that schools may now employ anyone to be a teacher. Recognising the political impossibility of forcing teacher bulk funding onto schools (79% of Board members were opposed to this in one survey; Wylie, 1991) a voluntary scheme was introduced for 1992 in schools, although it was imposed onto kindergartens. Government subsidies for private schools, which had previously been abolished, were reintroduced. Finally, a change in the method of calculating teacher entitlement for schools would see the loss of a large number of teaching positions from 1992.

These changes have been followed by others. Just before Christmas 1991 an Education Reform Act was passed which allowed anyone, not just parents of children at the school, to be elected to a Board of Trustees, and also allowed for representatives of organisations to be elected. These changes were specifically directed at encouraging businesses to get involved with school management. Indeed, a stated aim of National's policies is to "make schools more like businesses", or at least "more like private schools" (comments from Minister and Associate Minister of Education, 1991). A further change in the Reform Act removed minimum staffing levels for schools, opening the door for larger class sizes and a reduction in the number of teachers, should bulk funding be successfully introduced in the future.

Finally, even more changes are in the pipeline. The school charter, with its Labour-created social equity goals, is to lose its status as an official document linking local and national levels of the system. This role will in future be played by 'national education guidelines', which will be published as a series of regulations.

However, it is one thing for the government and state agencies to promote a set of ideologies, and quite another for these to be universally adopted. Although there is quite a lot of support evident for these policies in business circles (see Hawke, 1991), the educational community is largely opposed to the full marketization of education. The so-called trial of the bulk funding of teacher salaries, which the Minister of Education admits is a crucial step in what he calls the self-management of schools, and which was expected to lead to compulsory bulk-funding, has attracted less than 50 schools out of nearly 3000. This is a major blow to the Government. There is still a strong commitment in New Zealand to equity in education and, as Fisher (1991 p. 55) so clearly expresses it:



...choice is likely to exacerbate the trend towards SES segregation and therefore more stratification in the school system. Choice therefore clearly has the potential for undermining the comprehensive or common schools principle that underlies state provision in schooling in so many societies.

For this reason, a market education system will continue to be contested in New Zealand. Because the system is so centralized, with no intermediate steps between the central state and individual schools, teacher unions and Boards of Trustees have had some success in resisting the ideologies, if not the structural changes, of the marketization of education.

Conclusion

Grace (1991 p. 26) notes that the process of educational reform in New Zealand was "ideologically resourced from Britain and the USA", but, under the Labour Government, was implemented under specific national conditions which constituted a site of struggle, focussing in particular on the contested claims for 'equity' and 'competition'. Within the specific national context, including the relative success of the state in minimising inequalities between schools historically, the imported discourse of the market sat in marked contradiction to New Zealand's previous social aspirations and educational aims.

Central to the discourse of the market is competition both within and between schools. The Porter and Sexton Reports, the National Government's Minister of Education, state agencies such as Treasury and the State Services Commission and various business organisations, of whom the neo-liberal Business Roundtable was the most vocal, formed a powerful alliance, located completely outside of, and opposed to the existing practices of, the education system, notably teacher unions, the Ministry of Education and education academics. The discourse of this powerful ensemble of forces stressed the supposed necessity for education to become more competitive in order to secure New Zealand's economic future. However, the real purpose of this discourse was to transform the educational system into a series of competing institutions, where inevitably differences both within and between schools would increase.

This has been strongly resisted by educational organisations and institutions. Two kinds of arguments have underpinned the resistance to market reforms. The first has been based on the powerful historical record of New Zealand as a relatively equitable nation, along with the belief that the increasing inequalities of the past few years have impinged, in particular, on the least powerful and economically resourced groups, in particular Maori people. Thus, the basic



recognition, which owes nothing to socialist ideals but is embedded in the Keynesian mode of political management, that it is in the interests of the society as a whole that differences in wealth and power are minimised, has become coupled with the powerful new claims of Maori for a bi-cultural nation, including Maori self-determination in education and the economy.

The second set of arguments relate to the belief that the relative success, in international terms, of the New Zealand education system is the result of the relative homogeneity of schools and school populations. In other countries, and in New Zealand as well, school achievement is closely linked with social status and wealth (Brown and Lauder, 1991). Thus, to increase competition within and between schools, and in the broader social context, will in turn cause further inequalities in schools outcomes, and inevitably reduce the overall average educational standards of New Zealand. It is widely believed by educators, then, that the market model will lower the high educational standards of New Zealand schools.

The Picot reforms in education set up a system amenable to neo-liberal market educational reforms; they provided, as it were, the necessary but not the sufficient conditions for a market education system. During the period of the Labour Government, contradictions between ideals of equity and competition prevented the full implementation of a market system, despite attempts by powerful social and economic ensembles to force further reforms. The National Government, over the past eighteen months, has attempted to progressively remove all emphasis on equity in education, and to put into place a full market system. Although this government is able to undertake certain legislative reforms, and can point to a range of powerful national and international support for its neo-liberal goals in education, specific national conditions of the education system have prevented the full implementation of a market system of education. Teacher unions, united in their opposition, have provided the central focus of struggle. Other groups, notably the various opposition parties, Boards of Trustees and educational academics have also opposed aspects of the reforms. This kind of united opposition is a function of both the particular shape and structure of the educational system and the historical aspirations of New Zealanders, and appears unique to New Zealand. Although the degree of centralization and the demonstrated vulnerability of New Zealand to international trends allows for fast and direct reforms of the education system, that same centralized structure offers possibilities for contestation and opposition missing from other national contexts.

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